

DAVID L. ANDERSON (CABN 149604)
United States Attorney

HALLIE HOFFMAN (CABN 210020)
Chief, Criminal Division

MICHELLE J. KANE (CABN 210579)
KATHERINE L. WAWRZYNIAK (CABN 252751)
Assistant United States Attorneys

1301 Clay Street, Suite 340S
Oakland, California 94612
Telephone: (510) 637-3680
FAX: (510) 637-3724
michelle.kane3@usdoj.gov
katherine.wawrzyniak@usdoj.gov

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 16-00440 WHA
)	
Plaintiff,)	UNITED STATES' AMENDED EXHIBIT LIST
)	
v.)	Trial: March 9, 2020
)	Time: 7:30 a.m.
YEVGENIY ALEXANDROVICH NIKULIN,)	Courtroom No. 12
)	
Defendant.)	
)	
)	

The United States respectfully submits the attached exhibit list, which includes exhibits that the United States presently intends to introduce in its case-in-chief. This list is intended to be inclusive and is subject to amendment or supplementation as trial preparations progress. In addition, the list contains items, such as Reports of Investigation, that the United States does not intend to introduce in its case-in-chief, but that have been included here with exhibit numbers to reduce confusion should they need to be identified during trial. The government will notify the defense and Court of any changes to this list.

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Exh. No.	Date		Sponsoring Witness(es)	Description	Beg. Bates	End Bates
	Marked for Identification	Admitted into Evidence				
1				CD: Google search warrant results for chinabig01@gmail.com (August 29, 2012)	YN000002	
2				Certificate of authenticity for Google search warrant results, August 29, 2012	YN001674	
3				Email messages from chinabig01@gmail.com account (from Exhibit 1)	YN001693	YN001743
3A				Email from Serververhurr to chinabig01	YN001693	
3B				Email from Dropbox to Jammis re account creation	YN001713	
3C				Email from Dropbox to Jammis re Tom Wiegand	YN001715	
3D				Email from Formspring to chinabig01@gmail.com re account creation	YN001722	
3E				Email from LinkedIn to Jammiro Quatro re account creation	YN001732	
4				Intentionally left blank		
5				InsidePro.com screenshots re dwdm	YN000063	YN000066
6				InsidePro.com screenshots re slavuti4	YN004642	YN004643
7				Hard Drive: Copy of iMac computer	YN006683	
8				Intentionally left blank		
9				Intentionally left blank		
10				Duplicate – Intentionally left blank		
11				CD containing results of Skype search warrant for account dex.007	YN003411	

Exh. No.	Date		Sponsoring Witness(es)	Description	Beg. Bates	End Bates
	Marked for Identification	Admitted into Evidence				
12				Excerpts from response to Skype search warrant for account dex.007	YN003411-A	YN003411-D
13				Certificate of authenticity for Skype search warrant results	YN003412	
14				Google subscriber information for chinabig01@gmail.com (July 14, 2016)	YN003437	
15				Certificate of authenticity for Google records (July 14, 2016)	YN003440	
16				CD: Automatic intrusion logs	YN004640	
17				Summary of Automatic intrusion logs		
17A				Summary of Automatic IP overlap		
18				Formspring logs	YN004671	YN004772
19				Summary of Formspring logs		
19A				Summary of Formspring IP overlap		
19B				Summary of Formspring IP overlap with Skype data		
20				CD: Microsoft search warrant results for fyofyofyo@hotmail.com account (2012 DNV)	YN015024	
21A				Email message thread from search warrant results for fyofyofyo@hotmail.com account (messages with ibo ibo)	YN017736	

Exh. No.	Date		Sponsoring Witness(es)	Description	Beg. Bates	End Bates
	Marked for Identification	Admitted into Evidence				
21B				Email message thread from search warrant results for fyofyofyo@hotmail.com account (messages with ibo ibo)	YN017739	
21C				Email message thread from search warrant results for fyofyofyo@hotmail.com account (messages with ibo ibo)	YN017740	
21D				Email message thread from search warrant results for fyofyofyo@hotmail.com account (messages with ibo ibo)	YN018175	YN018227
21E				Email message thread from search warrant results for fyofyofyo@hotmail.com account (messages with ibo ibo)	YN018229	YN018231
22				Translation of email messages between fyofyofyo@hotmail.com and "ibo ibo" (French-English)	YN004788	YN004821
22A				Excerpt of translation of email messages between fyofyofyo@hotmail.com and "ibo ibo"		
22B				Excerpt of translation of email messages between fyofyofyo@hotmail.com and "ibo ibo"		
23				Google subscriber information for account udalite@gmail.com (August 2015)	YN004955	YN004960
24				Certificate of authenticity for Google subscriber records (udalite@gmail.com)	YN004963	
25				CD: Western Union records (Excel files)	YN005009	

Exh. No.	Date		Sponsoring Witness(es)	Description	Beg. Bates	End Bates
	Marked for Identification	Admitted into Evidence				
25A				Printout of Western Union records		
26				External hard drive containing LinkedIn VPN and SSH system logs	YN005014	
26A				Chinabig01@gmail.com account (from Exh. 26)		
27				Intentionally left blank		
28				Intentionally left blank		
29				Intentionally left blank		
30				Intentionally left blank		
31				Intentionally left blank		
32				CD: Summary of log entries from LinkedIn (Excel file, multiple tabs)	YN006743	
32A				CD: Summary of LinkedIn member info and IP history	YN006793	
32B				Summary of LinkedIn IP overlaps		
32C				Summary of LinkedIn IP overlaps with Skype data		
33				Summary of LinkedIn VPN log for user nberry (Excel file)	YN006745	
34				Certificate of authenticity for Google subscriber records (August 20, 2012)	YN006790	
35				Google subscriber records for chinabig01@gmail.com (August 20, 2012)	YN006791	
36				Intentionally left blank		

Exh. No.	Date		Sponsoring Witness(es)	Description	Beg. Bates	End Bates
	Marked for Identification	Admitted into Evidence				
37				Intentionally left blank		
38				Dropbox subscriber records for chinabig01@gmail.com (Jammis Gurus) (September 2012)	YN006809	YN006914
39				Intentionally left blank		
40				Intentionally left blank		
41				Google subscriber records for chinabig01@gmail.com (November 6, 2012)	YN006843	
42				Certificate of authenticity for Google records (November 6, 2012)	YN006842	
43				Certificate of authenticity for Afraid.org records	YN007069	
44				CD: Afraid.org records (Zip file)	YN007070	
44A				Syslog from Afraid.org records (Exh. 44)		
45				Afraid.org Records for username zopaqwe1	YN013363	YN013371
46				Certificate of authenticity for Google subscriber records (Google Plus ID 104244780492105546023)	YN007087	
47				Google subscriber records for Google Plus ID 104244780492105546023	YN007088	
48				CD: Kongregate subscriber records for Zopaqwe1 (Jammis Tom)	YN007768	YN007769
49				Intentionally left blank		
50				Intentionally left blank		

Exh. No.	Date		Sponsoring Witness(es)	Description	Beg. Bates	End Bates
	Marked for Identification	Admitted into Evidence				
51				Intentionally left blank		
52				Google subscriber records for chinabig01@googlemail.com (December 4, 2014)	YN012971	
53				Certificate of authenticity for Google records (December 4, 2014)	YN012973	
54				Google subscriber records for chinabig01@googlemail.com (July 2015)	YN012976	
55				Certificate of authenticity for Google records (July 2015)	YN012979	
56				Intentionally left blank		
57				Paypal subscriber records for 8bit-man@mail.ru	YN013009	YN013012
58				Instagram subscriber records for i.tak.soidet (remember.it.life@gmail.com) (October 2016)	YN013018	YN013019
59				Copy of Defendant's passport	YN013034	
59A				Translation of defendant's passport	YN015025	
60				Records provided by defendant	YN014641	YN014660
61				Translation of records provided by defendant	YN015026	YN015029
62				CD: Google search warrant results for chinabig01@gmail.com account (2019)	YN014814	
62A				Excerpt of results (search history) of 2019 search warrant to Google for chinabig01@gmail.com account (English) (Exh. 62)		

Exh. No.	Date		Sponsoring Witness(es)	Description	Beg. Bates	End Bates
	Marked for Identification	Admitted into Evidence				
63				Document custodian certification for Google search warrant results (2019)	YN017896	
64				Response to MLAT request to Ukraine (Original Ukrainian)	YN014838	YN014855
65				English translation of response to MLAT request to Ukraine	YN014820	YN014837
65A				Translation of passport of Oleksandr Ieremenko	YN014833	
65B				Certification by Lieutenant Colonel of Justice Tarasenko	YN014832	
66				Drive: Forensic image of computer of Oleksandr Ieremenko	YN014124	YN014125
66A				Photograph of Anna Shvedova from O. Ieremenko's computer (May 2012) (Exh. 66)		
66B				Photograph of Ieremenko Identity document from O. Ieremenko's computer (Exh. 66)	YN017899	
66C				Translation of Ieremenko identity document	YN18232	
66D				Photo of defendant from O. Ieremenko's computer (Exh. 66)		
67				CDs: FTK forensic report re computer of Oleksander Ieremenko	YN014111	YN014112
68				Magnet Forensic report of Skype chats between dex.007 and vaiobro (original Russian)	YN003368	YN003374
69				Translation notes for Skype chats	YN003378	
70				Translation of Skype chats (Excel file)	YN003378-A	
71				Photographs from computer of Oleksandr Ieremenko	YN014101	YN014110

Exh. No.	Date		Sponsoring Witness(es)	Description	Beg. Bates	End Bates
	Marked for Identification	Admitted into Evidence				
71A				Photograph of defendant and "Cash" (from Exh. 71)	YN014103	
72				Video clip from computer of Oleksandr Ieremenko (Exh. 66)	YN014096	
73				Translation of video clip YN014096	YN015054	
74				Video clip from computer of Oleksandr Ieremenko (Exh. 66)	YN014097	
75				Translation of video clip YN014097	YN015055	
76				CD: Original Russian language Skype chats from computer of Oleksandr Ieremenko (Exh. 66)	YN014082	YN014087
76A				Excerpts of Skype chats	YN018152	YN018159
76B				Translation of excerpts of Skype chats	YN018243	YN018250
77				Skype group chat contact list from computer of Oleksandr Ieremenko (Exh. 66)	YN014088	
78				CD: Skype log from computer of Oleksandr Ieremenko (Exh. 66)	YN014089	
79				Response to MLAT Request to Russian Federation, dated January 28, 2013	YN003252	YN003265
80				Response to MLAT Request to Russian Federation, dated October 30, 2013	YN001901	YN001918
81				Certificate of authenticity for response to MLAT request to Russian Federation	YN001913	
82				Response to MLAT Request to Russian Federation, dated October 30, 2013	YN000217	YN000234

Exh. No.	Date		Sponsoring Witness(es)	Description	Beg. Bates	End Bates
	Marked for Identification	Admitted into Evidence				
83				Certificate of authenticity for response to MLAT request to Russian Federation	YN000228	
84				English Translation of response to MLAT request to Russian Federation, translated February 19, 2014	YN003124	YN003133
85				Response to MLAT Request to Russian Federation, March 28, 2016	YN003446	YN003464
85A				English translation of response to request to Russian Federation	YN018122	YN018140
86				Certificate of authenticity for MLAT response from the Authority of the Russian Federation	YN003459	
87				CD: Defendant's recorded calls, files 174_37, 159_924, 194_513	YN014139	
88				Translation/excerpt of defendant's call 174.37 (Nov. 8, 2018)	YN015030	YN015038
88A				CD: Excerpt of defendant's call 174.37 (Nov. 8, 2018)		
89				Translation/excerpt of defendant's call 159.924 (Nov. 19, 2018)	YN015039	YN015044
89A				CD: Excerpt of defendant's call 159.924 (Nov. 19, 2018)		
90				Translation/excerpt of defendant's call 194.513 (Nov. 29, 2018)	YN015045	YN015049
90A				CD: Excerpt of defendant's call 194.513 (Nov. 29, 2018)		
91				Intentionally left blank		
92				Intentionally left blank		

Exh. No.	Date		Sponsoring Witness(es)	Description	Beg. Bates	End Bates
	Marked for Identification	Admitted into Evidence				
93				Intentionally left blank		
94				Report of Nick Berry (LinkedIn) interview, 6/20/2012	YN000237	YN000239
95				Report of Ganesh Krishnan (LinkedIn) interview, 6/19/2012	YN000240	YN000242
96				Report of Nick Berry (LinkedIn) interview, 7/5/2012	YN0001653	YN001654
97				Drive: Forensic image of laptop computer	YN001655	
98				Report of Cory Louie (Dropbox) Interview, 9/11/2012	YN001746	YN001747
99				Report of Barry Abrahamson telephone interview, 8/15/13	YN004597	
100				Report of Barry Abrahamson telephone interview, 8/8/13	YN004598	YN004599
101				Report of Ade Olonoh interview, 7/12/2012	YN004644	YN004645
102				E-mail from Matt Cudworth dated 1/8/2014	YN004825	
103				Email from Ade Olonoh re servers	YN004971	YN004972
104				Email from Matt Cudworth	YN004974	
105				Intentionally left blank		
106				Google subscriber records (ittagheuer@gmail.com)	YN012219	
107				Certificate of authenticity for Google records	YN012221	
108				Intentionally left blank		
109				Intentionally left blank		

Exh. No.	Date		Sponsoring Witness(es)	Description	Beg. Bates	End Bates
	Marked for Identification	Admitted into Evidence				
110				Certificate of authenticity for Yelp records	YN012264	
111				Yelp subscriber records	YN012263	
112				Report of Interview of Alex Kuznetsov	YN014451	YN014452
113				Vimeo subscriber records for chinabig01@gmail.com	YN012235	
114				Comcast subscriber records for 24.18.183.27	YN012763	
115				Certificate of authenticity for Comcast records	YN012764	
116				CD: Google search warrant results for chinabig01@gmail.com (November 2013)	YN013542	
117				Subscriber information, including IP logs, from Google search warrant results November 2013	YN001921	YN001952
118				Excerpt of results of 2019 search warrant to Google for chinabig01@gmail.com account (Russian language search history) (Exh. 62)	YN015056	YN015062
119				Translation from Russian of Google search warrant result excerpts (search history, 2019) (Exhibit 118)	YN015063	YN015069
120				Translation of email messages between fyofyofyo@hotmail.com and moy.yawik@gmail.com (Russian-English) (Complete translation at YN015677)	YN000202	

Exh. No.	Date		Sponsoring Witness(es)	Description	Beg. Bates	End Bates
	Marked for Identification	Admitted into Evidence				
120A				Original Russian language messages between fyofyofyo@hotmail.com and moy.yawik@gmail.com from	YN018142	YN018144
121				Instagram subscriber records (February 2019) for i.tak.soidet (remember.it.life@gmail.com)	YN015141	YN015217
122				Report of Bruno Connelly (LinkedIn) Interview	YN015858	YN015860
123				Certificate of authenticity for Instagram subscriber records (i.tak.soidet) (Exh. 58)	YN016050	
124				Summary of chinabig01@gmail.com account logins		
124A				Summary of chinabig01@gmail.com account logins with Skype data		
125				Google subscriber records for chinabig01@gmail.com (from Exhibit 1)		
126				Intentionally left blank		
127				Intentionally left blank		
128				Attachment (fr1k.csv) to translated email from fyofyofyo@hotmail.com search warrant results (from Exhibit 20)	YN017964	YN018006
129				Intentionally left blank		
130				Duplicate – intentionally left blank		

Exh. No.	Date		Sponsoring Witness(es)	Description	Beg. Bates	End Bates
	Marked for Identification	Admitted into Evidence				
131				Summary chart of logs from N. Berry computer (from Exhibit 7)		
131A				Madnez shell screen shots		
132				CD: Defendant's recorded calls	YN014856	YN014856
133				Intentionally left blank		
134				Intentionally left blank		
135				Translation/excerpt of defendant's call no. 20960956	YN016300	YN016301
135A				CD: Excerpt of defendant's call no. 20960956		
136				Translation/excerpt of defendant's call no. 21172516	YN016302	YN016308
136A				CD: Excerpt of defendant's call no. 21172516		
137				Certificate of authenticity for Kongregate records (Exh. 48)	YN016310	YN016310
138				Certificate of authenticity for Vimeo records (Exh. 113)	YN016315	YN016315
139				Certificate of authenticity for PayPal records (Exh. 57)	YN016320	YN016321
140				Certificate of authenticity for Western Union records (Exh. 25)	YN016325	YN016325
141				Certificate of authenticity for Instagram (Facebook) records (Exh. 121)	YN016364	YN016364
142				Summary of Dropbox IP log	YN016428	YN016430
142A				Summary of Dropbox IP Overlap		

Exh. No.	Date		Sponsoring Witness(es)	Description	Beg. Bates	End Bates
	Marked for Identification	Admitted into Evidence				
142B				Summary of Dropbox IP Overlap including Skype IP data		
143				CD: Google search warrant results for r00talka@gmail.com (February 2020)	YN016432	
143A				Certificate of authenticity for Google search warrant results for r00talka@gmail.com (February 2020)	YN016578	
143B				Excerpts (Russian) of email from Google search warrant results for r00talka@gmail.com	YN016479	YN016545
143C				Translation of VK email excerpts (Russian) from Google search warrant results for r00talka@gmail.com	YN018044	YN018078
143D				English email excerpts from Google search warrant results for r00talka@gmail.com	YN016912	YN017732
143E				Summary of Activity (Search history – Russian language) from r00talka@gmail.com Google search warrant results.	YN016546	YN016548
143F				English translation of r00talka@gmail.com search history	YN018113	YN08114
143G				Translation of other email excerpts (Russian) from Google search warrant results for r00talka@gmail.com	YN018115	YN018119
144				Intentionally left blank		
145				Intentionally left blank		
146				Certificate of authenticity for Dropbox subscriber records (Exh. 38)	YN016557	

Exh. No.	Date		Sponsoring Witness(es)	Description	Beg. Bates	End Bates
	Marked for Identification	Admitted into Evidence				
147				Certificate of authenticity for Microsoft search warrant results for fyofyofyo@hotmail.com (DNV) (Exh. 20)	YN016551	
148				MDC Contact List	YN014256	
149				Email from Yevgeniy Nikulin to Mihail Nikulin	YN014340	
150				Translation of email from Yevgeniy Nikulin to Mihail Nikulin	YN018147	
151				Screenshots of Anna Shvedova social media		

DATED: March 8, 2020

Respectfully submitted,

DAVID L. ANDERSON
United States Attorney

/s/ _____
MICHELLE J. KANE
KATHERINE L. WAWRZYNIAK
Assistant United States Attorneys